

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA

[This form is for non-prisoners to file a civil complaint. NEATLY print in ink (or type) your answers.]

DeAngelo L. Hatch

[You are the **PLAINTIFF**, print your full name on this line.]

v.

The Department of Child Services

[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number 1:17-CV-357

[For a new case in this court, leave blank.

The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

## CIVIL COMPLAINT

#	Defendant's Name and Job Title	Address
1	[Put the defendant named in the caption in this box.] <u>The Department of Child Services</u>	<u>201 E. Rortisill Blvd.</u> <u>Suite 200</u> <u>Fort Wayne, IN 46806</u>
2	[Put the names of any other defendants in these boxes.] <u>Jennifer Fletcher</u> <u>Supervisor Department of Child Services</u>	<u>201 E. Rortisill Blvd.</u> <u>Suite 200</u> <u>Fort Wayne, IN 46806</u>
3	<u>Chrystal Graham</u> <u>Family Casemanager</u>	<u>201 E. Rortisill Blvd.</u> <u>Suite 200</u> <u>Fort Wayne IN 46806</u>

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and address of each defendant in a separate box as shown here.]

- How many defendants are you suing? 3
- What is your address? 2707 N. Clinton Street  
Fort Wayne IN 46805
- What is your telephone number: (260) 415-7224
- Have you ever sued anyone for these exact same claims?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

### CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

**DO NOT:** Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how these events happened.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

**DO NOT:** Include the names of minors, social security numbers, or dates of birth.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [The first paragraph has been numbered for you.]

1. On the 24<sup>th</sup> of July Chrystal Graham (FCM) violated my rights by way of the 14<sup>th</sup> amendment. Chrystal Graham removed my daughter from the custody of her mother. I have joint legal custody and I am her natural father. I have a right to custody, care, and management of my daughter as protected under the 14<sup>th</sup> Amendment.
2. The Department of Child Services, Chrystal Graham, and Jennifer Fletcher violated my Constitutionally protected right under the 14<sup>th</sup> Amendment to rear my child without state interference. Number 3
3. Jennifer Fletcher, and Chrystal Graham violated my rights to due process. Jennifer Fletcher, and Chrystal Graham used unsubstantiated evidence to unfairly portray me as a drug addict. This act rendered me from getting custody of my daughter. Jennifer Fletcher, and Chrystal Graham both harmed me by not following the exact course of the law. I was not treated fairly within court and was shown biased by Jennifer Fletcher and Chrystal Graham. On numerous occasions Jennifer Fletcher

**[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]**

Claims and Facts (continued)

and Crystal Graham insisted that I needed to participate in services with The Department of Child Services. I have never had a case with them nor do they have any evidence of myself needing their services. Number 1  
4. Under the 6<sup>th</sup> Amendment I have the right not

PRIOR LAWSUITS – Have you ever sued anyone for this exact same event?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

RELIEF – If you win this case, what do you want the court to order the defendant to do?

Return my daughter to me immediately

FILING FEE – Are you paying the filing fee?

☐ Yes, I am paying the \$400.00 filing fee. I understand that I am responsible to notify the defendant about this case as required by Federal Rule of Civil Procedure 4. [If you want the clerk to sign and seal a summons, you need to prepare the summons and submit it to the clerk.]

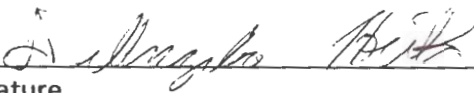
☒ No, I am filing a Motion to Proceed In Forma Pauperis and asking the court to notify the defendant about this case.

[Initial Each Statement]

D.H. I will keep a copy of this complaint for my records.

D.H. I will promptly notify the court of any change of address.

D.H. I declare **under penalty of perjury** that the statements in this complaint are true.

  
Signature

9-26-17  
Date



to be subjected to hearsay evidence. The department of Child Services, Jennifer Fletcher, and Chrystal Graham used hearsay evidence. From which they say my daughter said, to use against me regarding the placement of my child. If this hearsay evidence was not present I would have my daughter. Number 1.

5. The Department of Child Services, Jennifer Fletcher, and Chrystal Graham violated my right under the 5<sup>th</sup> Amendment to not be compelled to be a witness against himself. By regularly ordering me to cooperate with ~~the~~ The Department of Child Services and trying to force me to use services I do not need.

6. The Department of Child Services, Jennifer Fletcher, and Chrystal Graham again violated my rights under the 14<sup>th</sup> Amendment. This was done by proving me guilty and unfit to have custody of my daughter without due process.

I have been denied my rights to my child before due process of the law occurred. Number 1

7. Pursuant to ~~the~~ 42 USC 1983 every person has the right to be free from constitutional violations caused by government actors. My rights were violated as a parent, and an individual by The Department of Child Services, Jennifer Fletcher, and Chrystal Graham. Those rights being stated in the above paragraphs.